



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI  
GOVERNOR

DAVID P. LITTELL  
COMMISSIONER

October 13, 2006

Mr. Orlando Monaco  
Department of Navy  
Base Realignment and Closure  
Program Management Office-Northeast  
4911 South Broad Street  
Philadelphia, PA 19112-1303

Re: Site 9

Dear Mr. Monaco:

Pursuant to Section VI of the Naval Air Station, Brunswick, Maine Federal Facility Agreement (Oct 1990), as amended, the Maine Department of Environmental Protection (MEDEP) has reviewed the Hazardous Waste and Letter Work Plan for Site 9, dated September 28, 2006, prepared by the U.S Navy. Based on that review MEDEP has the following comments and issues.

The Navy has not responded to all MEDEP's requests for information outlined in a letter dated August 2, 2006, specifically that the Navy to provide a figure of the site showing the sampling locations, and to provide the existing analytical data.

The figure provided with this workplan depicts the extent of the excavation and, to some degree, the sampling locations however some of the sampling locations are outside the extent of the excavation and there are no sampling locations shown where regulators were told that the ash was removed and confirmation samples taken. When MEDEP toured the site in July we were told that sampling locations were not flagged per the workplan but GPS's, so the information should be available, if the SOP was followed.

In earlier discussions MEDEP, EPA and the Navy discussed the possibility of a comparison study to determine if the previous sampling was representative, however since so few of the sampling points remain in their original state and can be located the comparison study would have little value. Therefore MEDEP no longer recommends a comparison study and will require re-sampling of the water in the frac tanks, soil piles, debris piles and waste piles. The hazardous waste pile does not need to be re-sampled since it was determined to be hazardous waste.

The Navy needs to provide a revised workplan that includes but is not limited to the following:

- how the current excavated material (excluding the known hazardous waste) will be segregated
- where it will be stockpiled and held for analytical results,
- size of the pile
- number of samples per pile
- number of sampling locations per composite

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Page 2 of 2

- sampling locations,
- sampling methods
- sampling depth
- sampling handling
- analytical methods
- and tracking of results with the shipment for disposal.

(Some of this information was provided in the September 28, 2006, packet or discussed during the conference call on October 5, 2006, but it needs to be included in a revised form for handling the waste on site and any remaining material to be excavated.)

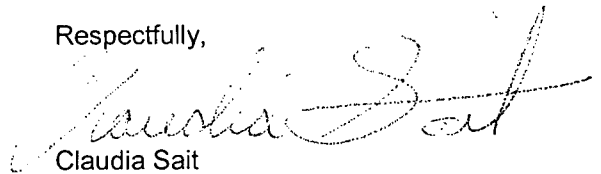
Please be sure to in the workplan that MEDEP must be notified at least a week in advance of removing the overlapping waste piles from the hazardous waste pile to ensure that the poly sheeting does indeed separate the hazardous waste pile for the overlapping ash piles and when the sampling of the waste pile is initiated.

MEDEP has no comments on the SOP for Hazardous Waste Management.

Unfortunately MEDEP staff is not available for the pre-construction meeting to lift the suspension order scheduled for October 17, 2006, but hopefully these comments will help.

Please contact me at (207) 287-7713 or [claudia.b.sait@maine.gov](mailto:claudia.b.sait@maine.gov), if you have any questions or comments.

Respectfully,



Claudia Sait  
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